

# Update on the derogation process

# What is new since our last meeting?

- Four national requests for derogation
- Derogation until Q2 2023 based on Road Map, but assessment ongoing
- Consultations in Sweden, Denmark and Finland in March
- There are risks (regulatory, IT development, implementation)
- Derogation has limited impact on European energy markets and integration of European balancing markets

Still a Monday in  
Q2 2023

Mixed signals

Electronic ordering,  
Covid-19

# Conslutation

- Finland:
  - Replies from Fortum, UPM, Energiategollisuus, Caruna
  - Fortum (UPM with similar views): Plan is too TSO-centric, 15 min ID market a prerequisite, not 15 min balancing markets, connect directly and sooner to MARI (no Nordic AOF) and PICASSO – lost trading opportunities
- Denmark:
  - Reply from Ørsted: Support the derogation, but question if TSOs are ready in Q2 2023 – why not Q4 2024, would like more involvement
- Norway
  - Replies from Statkraft and Hafslund E-CO, expecting from Norsk Hydro and Skagerak Energi
  - Derogation means reduced trading opportunities, but acceptable, concerned that European standard products will not fit Nordic high quality products, on track with replacing meters, concerned about readiness of DSOs and suppliers

## Risk

- aFRR CM to ACER – impact assessment concluded that it would not affect go live in Q2 2023
- Minor change in milestone for "Start pilot electronic ordering in Sweden" due to delay with technical solution
- Covid-19: So far the impact is limited and under control, but will affect progress and road map if "normalization" takes time

## Process and date

- Due to the increased risk, the NRAs have accepted that the TSOs wait with sending the request for derogation
- NBSC meeting in late May – requests will be sent after that
- Different process in Norway, but working towards the same target
- Potential dates are 08. 15. or 22. May 2023